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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAINE CARROLL,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

) Case No. 2:17-cv-02237-MMD-PAL
)
)
)
)
**JOINT STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR REVERSAL
OR REMAND**
)
)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for thirty days from February 2, 2018 to March 2, 2018. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was out on bereavement leave due to the sudden and unexpected death of a family member. Due to shortened staff, heavy workload and unanticipated leave, Counsel for Defendant has over 70+ active pending Social Security matters, of which require 2+ responses to dispositive motions per week until early-

1 March. As such, Counsel needs additional time to adequately review the transcript and properly
2 respond to Plaintiff's Motion for Reversal and/or Remand. Defendant makes this request in good faith
3 with no intention to unduly delay the proceedings. The parties further stipulate that the Court's
4 Scheduling Order shall be modified accordingly.

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7 Respectfully submitted,

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9 Dated: January 31, 2018

10 /s/ *Cyrus Safa
(*as authorized by email on January 31, 2018)
11 CYRUS SAFA
Attorney for Plaintiff

12

13 Dated: January 31, 2018

14 DAYLE ELIESON
15 Acting United States Attorney
16 DEBORAH LEE STACHEL
17 Regional Chief Counsel, Region IX
Social Security Administration

18 By /s/ Tina L. Naicker
19 TINA L. NAICKER
Special Assistant U.S. Attorney
20 Attorneys for Defendant

21 **ORDER**

22 APPROVED AND SO ORDERED:

23

24 DATED: February 2, 2018

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26 THE HONORABLE PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE